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Rocky Flats Office

ACTION Hedahl
DIST. LTH ENG

JAN 22 1993

EG&G
ROCKY FLATS PLANT
CORRESPONDENCE CONTROL

BENEDETTI, R.L.	XX
BENJAMIN, A.	
BERMAN, H.S.	
CARNIVAL, G.J.	
CORDOVA, R.C.	
CROUCHER, D.W.	
DAVIS, J.G.	
FERRERA, D.W.	
HANNI, B.J.	
HEALY, T.J.	
HEDAHL, T.G.	XX
HILBIG, J.G.	
IDEKER, E.H.	
KIRBY, W.A.	
KUESTER, A.W.	
LEE, E.M.	
MANN, H.P.	XX
MARK, G.E.	
McKENNA, F.G.	XX
MORGAN, R.V.	
PIZZUTO, V.M.	
POTTER, G.L.	
RILEY, J.H.	
SANDLIN, N.B.	
SATTERWHITE, D.G.	
SCHUBERT, A.L.	
SETLOCK, G.H.	XX
SHEPLER, R.L.	
SULLIVAN, M.T.	
SWANSON, E.R.	
WILKINSON, R.B.	XX
WILSON, J.M.	XX
ZANE, J.O.	XX

Osborne W XX

Taylor K XX

CORRES CONTROL	x	x
TRAFFIC		

Reviewed for Addressee
Corres. Control RFP1-25-93
DATE BY

Ref Ltr. #

WMED:EAH:00449

Compliance with National Emission Standards for Hazardous Air Pollutants

T. G. Hedahl, Associate General Manager
Environmental and Waste Management
EG&G Rocky Flats, Inc.

Please refer to several recent letters (attached) from the Environmental Protection Agency (EPA) Region VIII pertaining to National Emission Standards for Hazardous Air Pollutants (NESHAPs) compliance issues. Although EG&G Rocky Flats, Inc. was either the recipient, co-recipient or copied on these letters, I want to emphasize my expectation that EG&G will address these issues thoroughly and aggressively.

To that end EG&G is directed to do the following by January 27, 1992:

1. Submit to EPA via the Rocky Flats Office the response to concerns raised in the October 15, 1992, letter regarding point source emissions. We understand that EG&G may have already responded, in that case simply provide use with a signed copy.
2. Provide a written strategy, methodology and schedule for developing the 1992 Air Emissions Annual Report which includes diffuse sources. Note in the October 15, 1992, EPA letter their requirement that this inventory must be done on an Individual Hazardous Substance Site (IHSS) basis. Since we have heard nothing to the contrary, we assume your efforts will meet EPA expectations. If this is not the case, we expect you to offer an explanation promptly and be prepared to discuss the matter jointly with EPA.
3. Provide us with a status report of laboratory capabilities to support timely resolution of the Administrative Compliance Order.
4. Submit a schedule for preparing and submitting applications for all new construction activities or modifications initiated since February 5, 1985 which are subject to 49 CFR 61.07, and which are not yet in operation (such as the Supercompactor). Our reading of EPA's letter and subsequent verbal discussions would indicate that this requirement applies to construction activities not subject to the IAG, and which have the potential to cause diffuse emissions of radionuclides in excess of background levels. Point sources subject to this requirement include any new processes or modifications which would cause any increase in NESHAPs emissions.
5. Advise us when EG&G will develop a list of construction activities or modifications subject to 40 CFR 61.07 which have been completed or put into operation since December 15, 1989.

ADMIN RECORD

6. Advise us when EG&G will develop a list of construction activities or modifications subject to 40 CFR 61.07 which have been completed or put into operation since February 5, 1985 but prior to December 15, 1989.

If you have any questions regarding this request, please contact me or Tom Lukow at extension 4561.


James K. Hartman
Assistant Manager
for Environmental Management

Attachments

cc w/Attachments:

A. H. Paoule, Dep Mgr, RFO

M. S. Karol, AMO, RFO

S. A. Duletsky, EM, RFO

A. Howard, EM, RFO

M. Roy, OCC, RFO

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W. E. Osborne, EG&G

F. G. McKenna, EG&G

T. N. Lukas, Assistant Regional Counsel, EPA